

**SUPPORTING STATEMENT FOR VA FORM 22-1999
and the Electronic Version
(OMB Number 2900-0073)**

In this OMB 83-1 and supporting statement, a reference to VA Form 22-1999, VA Enrollment Certification, also includes the electronic version of VA Form 22-1999 which is referred to as VA-ONCE (VA Online Certification of Enrollment). The VA-ONCE version contains substantially the same information as the printed version of the 22-1999. The multiple versions of VA Form 22-1999 (VA Forms 22-1999-1, 22-1999-2, 22-1999-3, 22-1999- 4, 22-1999-5, and 22-1999-6) reported in the last submission are no longer used.

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits to veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, and 35, title 38, U.S.C., chapters 1606 and 1607, title 10, U.S.C., and sections 901 and 903 of Public Law 96-342. Educational institutions and job training establishments are required to report without delay, in the form prescribed by VA, information concerning the enrollment or reenrollment into training of veterans, service persons, reservists, and other eligible persons. In certain cases, VA is authorized to make payments in advance if the trainee requests an advance payment. In these cases, VA Form 22-1999 serves as the trainee's request for an advance payment as well as the educational institution's report of the trainee's enrollment. In certain instances, VA is authorized to make a lump sum payment of up to 60% of a claimant's tuition and fees if the trainee requests an accelerated payment. In these cases, VA Form 22-1999 serves as the trainee's request for an accelerated payment as well as the educational institution's report of the trainee's enrollment.

Public Law 108-375 (section 527) <http://vbaw.vba.va.gov/bl/22/ref/m22-4/Part%20XI/Public%20Law%20108.375%20Sec.%20527.doc>, created a new Department of Defense (DOD)-funded education program (chapter 1607, title 10, U.S. Code) that provides benefits to certain National Guard and Reserve members who are called or ordered to active service in response to a war or national emergency declared by the President or the Congress. No regulations have been issued. However, 10 U.S.C. 16166 provides the basis for collecting this information. We couldn't administer this new program without this information collection.

VA Form 22-1999 has been revised to include the new benefit program, Chapter 1607. Additionally, the instructions have been further segmented by topic and rearranged. The format has been changed to include chapter 1607. An important notice has been added on Sides A and B to provide more clarity.

The following administrative and legal requirements necessitate the collection:

- A. 38 U.S.C. 3034, 3241, 3680; and 3684, 10 U.S.C. 16136, and 16166
- B. 38 CFR 21.4203, 21.5200(d), 21.7152, and 21.7652

2. VA uses the information collected on these forms to determine the amount of educational benefits payable to the trainee during the period of enrollment or training. Additionally, VA also uses these forms to determine whether the trainee has requested an advance payment or accelerated payment of benefits. Without this information, VA would not have a basis upon which to make payment or to know if a person was requesting advance or accelerated payment.

3. Information technology is being used to reduce the burden. The method of obtaining the required information is the most efficient and causes the least burden on the public. The printed VA Form 22-1999 has historically been the primary method for schools to submit enrollment information. However, the electronic version, VA-ONCE, is increasingly replacing the paper version.

The URL is http://www.gibill.va.gov/School_Info/once/index.htm .

The log-in screen is http://vaonce.vba.va.gov/vaonce_student/default.asp . The school official has to register to use the program through the Education Liaison Representative at the local RO.

4. VA is not aware of any duplication of this information collection.

5. The educational institutions and job training establishments providing training are the only sources for this information. The information collection burden cannot be reduced for small educational institutions or job training establishments. The printed form or the electronic version must be submitted for any students receiving VA educational benefits because of school attendance or training. The information provided must be uniform and consistent regardless of the size of the educational institution or job training establishment.

6. Collection of this information at the beginning of each term or enrollment period, for trainees not enrolled on a term basis, allows VA to pay all benefits due to trainees, but prevents the overpayment of benefits.

7. The collection of this information does not require any special circumstances.

8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 31262-31263 of the Federal Register dated June 1, 2006 and . No comments have been received in response to this notice. Consultations outside VA have been held since the last submission for approval. VA used their input to design the Internet version of the form. Educational institutions have a continuing opportunity to comment on this form. Currently, there are no outstanding comments on VA Form 22-1999.

9. VA does not provide any payments or gifts to respondents.

10. VA Form 22-1999 is retained permanently in the trainee's education file. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Rehabilitation Records – VA (58VA21/22) which are contained in the Privacy Act Issuances, 2001 Compilation.

11. None of the information collected is considered to be of a sensitive nature.

12. The estimated annual burden for the collection of the information is 158,975 hours. The annual net cost to the public is \$ 151,378.

We estimate that 7,485 schools or training establishments (respondents) will submit this information. We estimate that respondents will make 70% of their submissions electronically and 30% by paper.

We estimate that respondents will submit 1,109,129 responses per year. The frequency of submission varies according the number of students at a facility and the number of changes in enrollment that occur per student. We estimate that it will take respondents on average 8 minutes to complete electronic submissions and 10 minutes to complete paper submissions.

The annual cost to the public is \$151,378. This is an increase from the previous cost of \$0. The cost to the public is due to an increase in enrollment, an increase in mailing cost, and no change in the reporting fee.

The cost to schools that submit school attendance electronically at an average of 8 minutes each is \$15 per hour. The cost to schools that submit school attendance electronically at an average of 10 minutes each is \$15 per hour.

Mailing costs are \$139,750 per year based on 332,739 submissions (with mailing cost of \$.42) from schools that submit school attendance using the paper form. NOTE: Schools that submit attendance electronically do not have any equivalent costs to a mailing cost as VA provides a toll-free telephone number for electronic submissions.

The annual cost to the public is reduced by the school reporting fee that VA pays schools for costs associated with providing this information. This figure is \$2,373,000 and has been computed by multiplying \$3,164,000 (the total reporting fee paid to the schools for FY 2004) by .75, the estimated portion of reporting fees attributable to the completion of this information collection. The net cost to the public is therefore \$151, 378.

VA pays each school that furnishes training under various education programs a fee for processing all required VA reports or certifications for each veteran or other VA education claimant. VA refers to these fees as "school reporting fees" which help defray costs of processing paperwork required to be submitted to VA. The reporting fee is in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967 and are in 38 U.S.C. 3684.

Summary of Cost to the Public:

VA Form 22-1999 (electronic submission)	\$ 1,552,781
VA Form 22-1999 (paper submission)	\$ 831,847
Plus Total Mailing Cost (paper submission)	\$ 139,750
Minus Reporting Fee	\$ -2,373,000

Net Total Public Cost	\$151,378

13. This submission does not involve any record keeping costs.

14. The annual costs to the government for administering this form is estimated at \$8,630,358. This cost is computed as follows:

a. The total processing cost is \$6,376,516. This is based on the following:

22-1999 Processor	Hourly wage	Processing Time	Total 22-1999s (1,109,129)	Total Cost
GS 9, step 5 claim examiner	\$20.73	20 minutes	332,739 (paper)	\$2,299,226
GS 9, step 5 claim examiner	\$20.73	15.2 minutes	776,390 (electronic)	\$4,077,290

The lower cost for electronic processing reflects efficiencies such as the elimination of the need to manually scan documents into electronic folders. The increased processing time reflects updated work rate standards.

b. The prorated reporting fee payments to educational institutions for preparing the forms is \$2,373,000. This amount has been computed by multiplying \$3,164,000 (the total amount of reporting fees paid to educational institutions during FY 2004) by .75 (the estimated portion of the reporting fee payments attributable to the completion of this form).

c. The administrative cost of \$16,650. This is the total for form development, design, printing and distributing 332,739 forms.

Summary of Cost to the Federal Government:

\$6,376,516	Processing Cost
\$2,373,000	Reporting Fee Payments
\$ 16,650	Administrative Cost
\$8,766,166	TOTAL

15. The change in the annual reporting burden (+21,551 hours) is caused partly because of an overall increase in the number of claimants training. This adjustment accounts for approximately 75% (or 16,213 hours) of the increase in burden hours. The remaining 25% (or 5,338 hours) is attributed to the implementation of a new benefit program (chapter 1607, Title 10, U.S.C). The decrease in the number of schools or other training establishments is attributed to the withdrawal of program approvals and other factors (such as a school's inactive status).

16. VA does not publish this information or make it available for publication.

17. The collection instrument, VA Form 22-1999, may be reproduced and/or stocked by the educational institutions. This VA form does not display an expiration date and if required to do so, it would result in unnecessary waste of existing stocks of this form. As these forms are submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the educational institutions and would delay VA action on the adjustment or termination of education benefits. VA also seeks to minimize the cost to itself of collection, processing, and using the information, by not displaying the expiration date. For these reasons, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 22-1999.

18. This information collection fully complies with all the requirements of 5 CFR 1320.8(b)(3).

B. Collection of Information Employing Statistical Methods.

This collection of information by the Veterans Benefits Administration does not employ statistical methods.

ATTACHMENTS

- A. 38 U.S.C. 3034, 3241, 3680(d), and 3684; 10 U.S.C. 16136, and 16166.
- B. 38 CFR 21.4203, 21.5200(d), 21.7152, and 21.7652.
- C. VA Form 22-1999